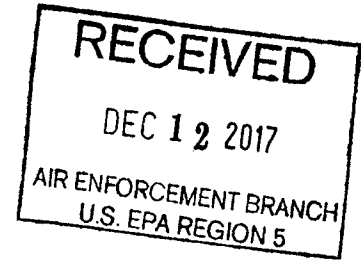


Natural Gas Pipeline Company of America LLC

December 8, 2017

USEPA (AR - 17J)
Air and Radiation Division
77 West Jackson Boulevard
Chicago, IL 60604



Re: Natural Gas Pipeline Company of America
Cropsey, Livingston County, IL - Station 312
40 CFR 60, Subpart OOOOa Initial Annual Report

To Whom It May Concern:

As required by 40 CFR 60.5420a(b), Natural Gas Pipeline Company of America (NGPL) is providing an initial Annual Report for *the collection of fugitive emissions components* located at the Cropsey, Livingston County, IL Compressor Station for the compliance period from October 14, 2016 through October 14, 2017.

Per 40 CFR 60.5397a(f)(2), an initial monitoring survey for a new collection of fugitive components located at a compressor station must be conducted within 60 days of startup of a new compressor station or by June 3, 2017, whichever is later. The Station 312 Compressor Station commenced operation as a newly constructed facility in October 14, 2016; therefore, the initial monitoring survey was required by June 3, 2017. However, based on the EPA's issuance of a 90-day stay on the fugitive monitoring requirements, extending the initial compliance date to August 31, 2017, NGPL scheduled initial monitoring surveys based on the extended compliance date established by the 90-day stay. Then, unpredictably on July 3, 2017, a federal appeals court ruled that the EPA did not have authority under the Clean Air Act to issue the stay, resulting in its reversal. Once the stay was reversed, the compliance date to conduct initial monitoring surveys was reestablished as June 3, 2017. Given the unexpected stay reversal, Kinder Morgan (NGPL) was in a position where the initial compliance date of June 3, 2017 had passed for several subject facilities. Once this reversal occurred, NGPL scheduled the Station 312 initial monitoring survey with its survey team at their next availability.

Since the initial monitoring survey was completed August 22, 2017, NGPL is providing information in the annual report of the subsequent deviation to the Monitoring Plan.

If you have any questions please contact me at (719) 520-4328, or at
Kenneth_Distler@kindermorgan.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth Distler".

Kenneth Distler
Sr. EHS Engineer

Natural Gas Pipeline Company of America, LLC
Station 312 – Initial Annual Report, 40 CFR 63 Subpart OOOOa
Page 2 of 2

Attachment

Cc: Illinois EPA, Bureau of Air
Compliance & Enforcement Section (MC 40)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

NSPS 0000a Annual Compliance Report

The following is general information required to be included in each annual report pursuant to 40 CFR 60 Subpart 0000a, *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015*

60.5420a(b)(1)(i)	Company Name, Facility/Site Name, Address or site location with latitude and longitude	Natural Gas Pipeline Company of America (b) (9)
60.5420a(b)(1)(ii)	Identification of each affected facility included in annual report	Collection of fugitive emissions components at a compressor station October 14, 2016 through October 14, 2017
60.5420a(b)(1)(iii)	Beginning and ending dates of the reporting period	Report Period Begin Date: October 14, 2016 Report Period End Date: October 14, 2017
60.5420a(b)(1)(iv)	Certification by Certifying Official	See end of report

The following required information is specific to each affected facility covered by this annual report pursuant to 40 CFR 60 Subpart 0000a, *Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced After September 18, 2015*

60.5420a(b)(7)(i)	Date of Survey	8/22/17
60.5420a(b)(7)(ii)	Beginning and end time of survey	10:10-1400
60.5420a(b)(7)(iii)	Name of operator(s) performing survey	(b) (6)
60.5420a(b)(7)(iii)	OGI training experience of camera operator	Over 4 years OGI operations experience
60.5420a(b)(7)(iv)	Ambient temperature, sky conditions, and maximum wind speed at time of survey	72F, Partly cloudy, 9.2 mph
60.5420a(b)(7)(v)	Monitoring instrument used	Opgal
60.5420a(b)(7)(vi)	List of deviations from monitoring plan or a statement that there were no deviations	A deviation to the monitoring plan occurred due to initial monitoring completed after compliance date of June 3, 2017. This was due to EPA/Court uncertainties then court decision after the implementation date of the monitoring component of Subpart 0000a.
60.5420a(b)(7)(vii)	Number and type of components for which fugitive emissions were detected	5
60.5420a(b)(7)(viii)	Number and type of components that were not repaired as required in	3

	60.5397a(h)	
60.5420a(b)(7)(ix)	Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored	1
60.5420a(b)(7)(x)	Date of successful repair of the fugitive emissions component	8/22/17
60.5420a(b)(7)(xi)	Number and type of fugitive emission component placed on delay of repair and explanation for each	1, #6 (Fan 13) Cooling Fan North inlet thermocouple connection. Station discharge piping will be blowdown to repair.
60.5420a(b)(7)(xii)	Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during initial fugitive emissions finding	CGI, Opgal

Based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Sincerely,



Dee Bennett
Director of Operations – Division 7